

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

RTD BY af D.C.  
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NOW  
CLERK U.S. DIST. CT.  
S.D. OF FLA.-FTL

CASE NO.: 00-6258-CR-FERGUSON/SNOW

UNITED STATES OF AMERICA, )  
Plaintiff, )

VS.

HAMLET VARGAS, )  
Defendant. )

**EMERGENCY MOTION TO CONTINUE**  
**CHANGE OF PLEA HEARING**

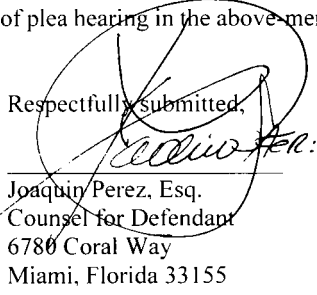
Defendant, HAMLET VARGAS, moves this Court for the entry of an Order continuing the change of plea hearing. In support of this motion Defendant states as follows:

1. The change of plea hearing is presently scheduled for Friday, February 16, 2001 at 11:00 a.m.
2. The undersigned is scheduled to appear at a bond hearing in Puerto Rico tomorrow at 10:00 a.m.
3. The Defendant in the present case is presently out on bond and the rescheduling of the change of plea hearing will not affect him.
4. This is the first time that a change of plea hearing is scheduled in this case and it is my understanding that the AUSA Donald Chase is out of the office until February 19, 2001, therefore, he had requested a trial continuance in the above-mentioned case.

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**WHEREFORE**, Defendant respectfully prays to this Honorable Court for the entry of an Order continuing the change of plea hearing in the above-mentioned case.

Respectfully submitted,

  
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Joaquin Perez, Esq.  
Counsel for Defendant  
6780 Coral Way  
Miami, Florida 33155  
Tel: (305) 261-4000  
Fax: (305) 662-4067  
Fl. Bar No.: 335339

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing was mailed this 15<sup>th</sup> day of February, 2001, to: Donald Chase, AUSA, 500 E. Broward Blvd., Suite 700, Ft. Lauderdale, Florida 33301.

BY:

  
\_\_\_\_\_  
Joaquin Perez, Esq.